

MCNUTT LAW FIRM, P.C.  
Daniel R. McNutt, Esq., Bar No. 7815  
Matthew C. Wolf, Esq., Bar No. 10801  
Mark D. Hesiak, Esq., Bar No. 12397  
11441 Allerton Park Drive, Suite 100  
Las Vegas, Nevada 89135  
Tel.: (702) 384-1170 / Fax.: (702) 384-5529  
[drm@mcnuttlawfirm.com](mailto:drm@mcnuttlawfirm.com)  
[mcw@mcnuttlawfirm.com](mailto:mcw@mcnuttlawfirm.com)  
[mdh@mcnuttlawfirm.com](mailto:mdh@mcnuttlawfirm.com)

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*Counsel for LVMPD Defendants*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KRISTINA ANDERSON,

Case No.: 2:24-cv-01162-APG-DJA

**Plaintiff.**

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of  
the State of Nevada; OFFICER W. BET-  
TENCOURT, individually and as a police  
officer; DETECTIVE C. GIFFORD, individ-  
ually and as a police officer; DETEC-  
TIVE WEGHORST, individually and as a  
police officer; Defendant PICERNE SUN-  
SET, LLC, dba LEVEL 25 AT SUNSET;  
DRPRMP MANAGER, LLC; DOE  
APARTMENT EMPLOYEES 1-25; ROE  
POLICE OFFICERS 26-50;

## Defendant.

## **Order to Stay Pretrial Deadlines**

Plaintiff Kristina Anderson, through the Ladah Law Firm, the LVMPD Defendants,<sup>1</sup> through the McNutt Law Firm, and the Apartment Defendants,<sup>2</sup> through Tyson & Mendes LLP, stipulate and agree to stay all pretrial deadlines in the Stipulated Discovery Plan and Scheduling

<sup>1</sup> The LVMPD Defendants refers to Defendants Las Vegas Metropolitan Police Department (LVMPD), Detective C. Gifford, Detective Weghorst, and Officer W. Bettencourt.

<sup>2</sup> The Apartment Defendants refers to Defendants DRPRMP MANAGER LLC and Picerne Sunset, LLC.

1 Order dated August 19, 2024, Dkt. 25, until the resolution of (1) the LVMPD Defendants' mo-  
2 tion to dismiss filed on June 25, 2024 (Dkt. 2); and (2) Ladah Law Firm's motion to withdraw  
3 as counsel for Plaintiff Kristina Anderson filed on November 25, 2024 (Dkt. 32).

4 Good cause supports the stay request. Ladah Law Firm has lost contact with Plaintiff  
5 Kristina Anderson. Consequently, Anderson has not responded to written discovery pro-  
6 pounded by the LVMPD Defendants and the Apartment Defendants, and they have been unable  
7 to depose Anderson. The LVMPD Defendants and the Apartment Defendants must receive  
8 Anderson's written discovery responses and depose her by serving initial expert disclosures.

9 Furthermore, the district court's ruling on the LVMPD Defendants' motion to dismiss  
10 could change the nature of the case, including, without limitation, the remaining parties and  
11 claims for relief. For that reason, it would promote judicial efficiency and economy for the  
12 parties to make their initial expert disclosures following that ruling. Should the district court  
13 deny the motion to dismiss, its rulings will provide clarification and guidance regarding the  
14 remaining issues, if any, necessitating discovery. Postponing discovery until the district court  
15 issues its ruling will allow the parties to conserve time and resources by focusing discovery on  
16 the issues identified in the ruling. It will also eliminate the need for this Court to address dis-  
17 covery disputes on issues that could be altered or narrowed by the ruling.

18 Within seven days of the last order resolving the LVMPD Defendants' motion to dismiss  
19 and Ladah Law Firm's motion to withdraw, the parties will submit a new stipulated discovery  
20 plan and scheduling order.

21 *(continued on next page)*

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This stipulation is the parties' first request to stay discovery, has been submitted in good faith, is not interposed for delay, and is not filed for an improper purpose.

## IT IS SO STIPULATED.

## MCNUTT LAW FIRM, P.C.

LADAH LAW FIRM

/s/ *Dan McNutt*

Dan McNutt, Esq. (Bar No. 7815)  
Matt Wolf, Esq. (Bar No. 10801)  
11441 Allerton Park Drive, Suite 100  
Las Vegas, Nevada 89135  
*Counsel for the LVMPD Defendants*

/s/ Michael T. Nixon

RAMZY PAUL LADAH, ESQ.  
Nevada Bar No. 11405  
MICHAEL T. NIXON, ESQ.  
Nevada Bar No. 012839  
517 S. Third Street  
Las Vegas, NV 89101  
*Counsel for Plaintiff*

TYSON & MENDES LLP

/s/ Griffith H. Hayes

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GRIFFITH H. HAYES  
Nevada Bar No. 7374  
CHRISTOPHER A. LUND  
Nevada Bar No. 12435  
2835 St. Rose Pkwy., Suite 140  
Henderson, NV 89052  
*Counsel for the Apartment Defendants*

The Court finds that the parties have demonstrated good cause to stay discovery. See *Schrader v. Wynn*, 2021 WL 4810324, (D. Nev. Oct. 14, 2021).

IT IS THEREFORE ORDERED that the parties' stipulation (ECF No. 33) is GRANTED.

IT IS FURTHER ORDERED that, within seven days of the last order resolving the LVMPD Defendants' motion to dismiss and Ladah Law Firm's motion to withdraw, the parties will submit a new stipulated discovery plan and scheduling order.

  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: January 16, 2025